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COMMENTS:

**DOES NOT CONTAIN CBI**

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**UNITED INITIATORS**

*driving your success*

April 12, 2013

US EPA Office of Pollution Prevention and Toxics  
EPA East Building - Room 6428 - Attn: Section 8(e)  
1201 Constitution Avenue, NW  
Washington, DC 20004-3302

United Initiators, Inc.  
555 Garden Street  
Elyria, Ohio 44035  
USA

Return Receipt Requested

SUBJECT: TSCA 8(e) Notice



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Dear TSCA Section 8(e) Coordinator:

On behalf of the study sponsor named below, I am submitting results for a Acute Inhalation Toxicity Study with Tert-Butyl Peroxyisobutyrate (CAS 109-13-7). The study sponsor is United Initiators GmbH & Co. KG.

Study Summary and Preliminary Conclusion:

The inhalation hazard of Tert-butyl peroxyisobutyrate (TBPIB, 75 % (w/w) in isododecane, CAS No. 109-13-7) after short-term exposure is currently assessed in an acute inhalation toxicity study on rats according to OECD TG 403, Acute Inhalation Toxicity, September 2009 and the EPA Health Effects Test Guidelines, OPPTS 870 1300, Acute Inhalation Toxicity, August 1998.

In a first sighting study, one male and one female Wistar rat were exposed to the test item vapour. The test atmosphere concentration was 6.9 mg/L 75% TBPIB, the highest technically attainable concentration. Both animals died within 24 hour post-exposure. A second sighting study was performed using a test atmosphere concentration of 1.5 mg/L 75% TBPIB. No mortality occurred within 14 days post-exposure and the behaviour was comparable to non-treated animals.

This submission is not considered to be confidential. The item of concern is on the public list.

Please contact me at (440) 822-3774 if you have any questions regarding this letter.

Sincerely,

*Meredith L. Nash*

Meredith L. Nash

Technical Engineer



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**CONTAINS NO CBI**



United Initiators, Inc  
555 Garden Street  
Elyria, OH 44035  
USA



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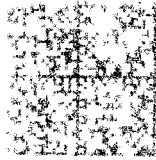


Figure 1: Schematic representation of the experimental design. The diagram shows a sequence of events: 'Pretest' (a person at a computer), 'Training' (a person at a computer with a 'Training' label), 'Transfer' (a person at a computer with a 'Transfer' label), and 'Test' (a person at a computer with a 'Test' label). Arrows indicate the flow from Pretest to Training, Training to Transfer, and Transfer to Test. A 'Control' group is shown in a separate box, also receiving 'Pretest', 'Training', and 'Test' phases. A 'Posttest' phase is shown at the end of the sequence.

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